

1 Jeff Silvestri (ISBN 5779)  
2 Kiley A. Harrison (ISBN 16092)  
3 McDONALD CARANO LLP  
4 2300 West Sahara Avenue, Suite 1200  
5 Las Vegas, Nevada 89102  
Telephone: (702) 873-4100  
jsilvestri@mcdonaldcarano.com  
kharrison@mcdonaldcarano.com

6 Hwan Kim (D.C. Bar No. 463623)  
7 (*Admitted Pro Hac Vice*)  
8 Adam A. Bartolanzo (D.C. Bar No. 997621)  
9 (*Admitted Pro Hac Vice*)  
10 SHEPPARD MULLIN RICHTER & HAMPTON LLP  
11 2099 Pennsylvania Avenue, N.W., Suite 100  
Washington, DC 20006-6801  
Telephone: (202) 747-1949  
hkim@sheppardmullin.com  
abartolanzo@sheppardmullin.com

12 Neil A.F. Popović (CA Bar No. 132403)  
13 (*Admitted Pro Hac Vice*)  
14 SHEPPARD MULLIN RICHTER & HAMPTON LLP  
15 Four Embarcadero Center, 17th Floor  
16 San Francisco, CA 94111  
Telephone: (415) 774-3156  
npopovic@sheppardmullin.com

17 || Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

21 FREMICHAEL GHEBREYESUS,  
22 individually and as Trustee of the Estate of  
23 Ghebreyesus Ghebrelul Fremichael; and  
SIMRET ZERAI YOHANNES (A/K/A  
SEMRET ZEREYOHANS KELEB),

24 Plaintiffs,

25

26 THE FEDERAL DEMOCRATIC  
27 REPUBLIC OF ETHIOPIA; THE  
28 MINISTRY OF FOREIGN AFFAIRS OF  
ETHIOPIA; THE CITY OF ADDIS ABABA;  
THE SUB-CITY OF BOLE, ADDIS

Case No.: 2:22-cv-01717-RFB-EJY

**STIPULATION AND [PROPOSED]  
ORDER RE BRIEFING SCHEDULE FOR  
RENEWED MOTIONS TO DISMISS**

**(FIRST REQUEST FOR SUBJECT DEADLINES)**

1 ABABA; FEDERAL FIRST INSTANCE  
 2 COURT OF ETHIOPIA; BROOK BEKELE  
 3 BESHAH (A/K/A BIRUK BEKELE  
 4 BESHAH; A/K/A BIRUK BEKELE; A/K/A  
 5 BROOK BEKELE),

6  
 7 Defendants.  
 8  
 9

10 Plaintiffs Fremichael Ghebreyesus, individually and as Trustee of the Estate of  
 11 Ghebreyesus Ghebrelul Fremichael, and Simret Zerai Yohannes (“Plaintiffs”) and Defendants  
 12 Federal Democratic Republic of Ethiopia; the Ministry of Foreign Affairs of Ethiopia; the City of  
 13 Addis Ababa; the Sub-City of Bole, Addis Ababa; Federal First Instance Court of Ethiopia  
 14 (collectively, the “Ethiopian Government Defendants”); and Brook Bekele Beshah (“Bekele”)  
 15 (with the Ethiopian Government Defendants collectively, “Defendants”), by and through their  
 16 undersigned counsel, stipulate and agree as follows:

17 1. On October 28, 2021, Plaintiffs filed their Complaint against Defendants in the  
 18 United States District Court for the District of Columbia (“D.C. Court”) [ECF No. 1].

19 2. On December 21, 2021, Bekele filed his Motion to Dismiss [ECF No. 15].

20 3. On April 6, 2022, the Ethiopian Government Defendants filed their Motion to  
 21 Dismiss [ECF No. 29].

22 4. On September 28, 2022, the D.C. Court granted Bekele’s Motion to Dismiss for  
 23 lack of personal jurisdiction, denied the Ethiopian Government Defendants’ Motion to Dismiss  
 24 without prejudice, and ordered that the case be transferred to this Court [ECF No. 33].

25 5. On October 12, 2022, the case was transferred to this Court [ECF No. 35].

26 6. On November 29, 2022, counsel for the parties participated in a FRCP 26(f)  
 27 conference and met and conferred regarding setting a briefing schedule for Defendants’ renewed  
 28 motions to dismiss.

29 7. The parties hereby stipulate and agree, subject to the Court’s approval, to set the  
 30 briefing schedule for Defendants’ renewed motions to dismiss as follows:

31 a. Defendants’ renewed motions to dismiss will be due by January 6, 2023.

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100 WEST LIBERTY STREET TENTH FLOOR • RENO NEVADA 89501  
 PHONE 775.788.2000 • FAX 775.788.2020

- b. Plaintiffs' oppositions to Defendants' renewed motions to dismiss will be due by January 27, 2023.
- c. Defendants' replies will be due by February 10, 2023.

## IT IS SO STIPULATED.

DATED: December 9, 2022

## MCDONALD CARANO LLP

By: /s/ Kiley A. Harrison

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Jeff Silvestri (ISBN 5779)  
Kiley A. Harrison (ISBN 16092)  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
[jsilvestri@mcdonaldcarano.com](mailto:jsilvestri@mcdonaldcarano.com)  
[kharrison@mcdonaldcarano.com](mailto:kharrison@mcdonaldcarano.com)

SHEPPARD MULLIN RICHTER  
& HAMPTON LLP  
Hwan Kim (D.C. Bar No. 463623)  
(*Admitted Pro Hac Vice*)  
Adam A. Bartolanzo  
(D.C. Bar No. 997621)  
(*Admitted Pro Hac Vice*)  
2099 Pennsylvania Ave, N.W., Ste  
Washington, DC 20006-6801  
hkim@sheppardmullin.com  
abartolanzo@sheppardmullin.com

SHEPPARD MULLIN RICHTER  
& HAMPTON LLP  
Neil A.F. Popović (CA Bar No. 132403)  
(*Admitted Pro Hac Vice*)  
Four Embarcadero Center, 17th Floor  
San Francisco, CA 94111  
n.popovic@sheppardmullin.com

*Attorneys for Plaintiffs*

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DATED: December 9, 2022

## BECKSTROM & BECKSTROM, LLP

By: /s/ *James A. Beckstrom*

James A. Beckstrom, II (NSBN 14032)  
400 South 4th Street, Suite 650  
Las Vegas, Nevada 89101  
[jb@beckstromlaw.com](mailto:jb@beckstromlaw.com)

RUSSELL A. BIKOFF LAW FIRM  
Russell A. Bikoff  
(D.C. Bar No. 407397)  
(*Admitted Pro Hac Vice*)  
1620 L Street, N.W., Suite 610  
Washington, DC 20036  
rabb@bikofflaw.com

SZYMKOWICZ & SZYMKOWICZ, LLP  
John Paul Szymkowicz  
(D.C. Bar No. 462146)  
John T. Szymkowicz  
(D.C. Bar No. 946079)  
P.O. Box 57333  
Washington, DC 20037-0333  
[jp@szymkowicz.com](mailto:jp@szymkowicz.com)  
[john@symkowicz.com](mailto:john@symkowicz.com)

*Attorneys for Defendant Brook Bekele  
Beshah*

IT IS SO ORDERED;

RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 12th day of December, 2022.

DATED: December 9, 2022

## DEMISSIE & CHURCH

By: /s/ Derege Demissie  
Derege Demissie (MA Bar No. 637544)  
(*Admitted Pro Hac Vice*)  
929 Massachusetts Avenue, Suite 101  
Cambridge, MA 02139  
dd@demissiechurch.com

CHESNOFF & SCHONFELD, PC  
David Z. Chesnoff (NSBN 2292)  
520 S. Fourth Street  
Las Vegas, NV 89101  
dzchesnoff@cslawoffice.net

PAIK, BREWINGTON & DEAL, LLP  
Alexandra H. Deal  
(MA Bar No. 660645)  
6 Beacon Street, Suite 305  
Boston, MA 02108  
adeal@pbdlaw.com

LAW OFFICES OF SAMUEL C. MOORE,  
PLLC  
Samuel C. Moore  
(D.C. Bar No. 1015060)  
526 King Street, Suite 506  
Alexandria, VA 22314  
[scmoore@scmoorelaw.com](mailto:scmoore@scmoorelaw.com)

*Attorneys for Ethiopian Government  
Defendants*

## IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

DATED: \_\_\_\_\_